

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA	)	
	)	CRIMINAL ACTION
v.	)	NO. 1:24-CR-00218-SEG-LTW-1
	)	
JOHN D. WOODBURY	)	

UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO FILE PRETRIAL MOTIONS

Defendant JOHN D. WOODBURY, through undersigned counsel, files this motion for extension of time to file pretrial motions. Pretrial motions are due on November 7, 2024. A pretrial conference is set for November 12, 2024. Defendant requests the Court allow him at least an additional 30 days to file pretrial motions. This would make motions due on December 6, 2024. Defendant further requests the pretrial conference be scheduled after December 6, 2024. In support of this motion, Defendant submits the following:

- 1) Mr. Woodbury entered a not guilty plea to the two-count indictment at his arraignment on July 18, 2024.
- 2) Mr. Woodbury is requesting in a motion to the district court that a pre-plea Presentence Report (PSR) be completed in this case. A pre-plea PSR will assist the parties in negotiating a pretrial resolution to this matter.
- 3) Assistant United States Attorney Jennifer Keen, counsel for the government, has no objection to the granting of this Motion.

4) The period from the filing of this motion through the pretrial conference is properly excluded from the speedy trial clock because the ends of justice served by granting this extension of time outweigh the best interest of the public and the defendant in a speedy trial. 18 U.S.C. §3161(h)(7)(A).

WHEREFORE, Defendant respectfully requests the Court continue the pretrial conference and allow him at least an additional 30 days to file motions.

Dated: This 6th day of November 2024.

Respectfully submitted,

/s/ Keenen J. Twymon

STATE BAR NO. 994921

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